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9 Attorneys for Defendants ALLIED PROPERTY
10 AND CASUALTY INSURANCE COMPANY
11 and AMCO INSURANCE COMPANY

12 UNITED STATES DISTRICT COURT OF CALIFORNIA
13
14 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION
15

16 JOELLEN HRUBY,

No. CV 07-6031 EMC

17 Plaintiff,

18 vs.

19 **STIPULATION TO ALLOW SITE**
20 **INSPECTION BEFORE RULE 26(F)**
21 **CONFERENCE OF PARTIES**
22 **RULES OF CIV. PROC. RULE 26(D)**

23 ALLIED PROPERTY AND CASUALTY
24 INSURANCE COMPANY, a corporation;
25 AMCO INSURANCE COMPANY, a
26 corporation, and DOES 1 to 10, inclusive,

Complaint Filed: 09/21/07
Trial Date: None Set

27 Defendants.
28 _____ /

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendants ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY
("Allied") and AMCO INSURANCE COMPANY ("AMCO") (or collectively "Defendants")
acting through their attorneys of record, Rudloff Wood & Barrows LLP, and Plaintiff JOELLEN
HRUBY ("Hruby" or "Plaintiff") acting through her attorneys of record, Lombardi, Loper &
Conant, LLP, stipulate:

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1 Whereas this matter was removed from state court to federal district court based upon
2 diversity of citizenship (28 U.S.C. §1332);

3 Whereas the parties have yet to conduct the Rule 26 conference of parties as set out under
4 Federal Rules of Civil Procedure Rule 26(f) or submit their initial discovery disclosures or
5 discovery plan under Federal Rules of Civil Procedure Rules 26(a)(1) and 26(f);

6 Whereas the parties are not required to conduct their Rule 26 conference until February 13,
7 2008;

8 Whereas the parties agree to allow Defendants to conduct a site inspection of Plaintiff's
9 home to assess, measure, photograph and videotape the property and damage before completing
10 such conference and disclosures as authorized under Federal Rules of Civil Procedure Rule 26(d);
11 and

12 Whereas the parties further agree that this site inspection shall constitute Defendants right
13 to demand an "Entry Upon Land for Inspection and Other Purposes" as authorized under Federal
14 Rules of Civil Procedure Rule 34;

15 THEREFORE THE PARTIES STIPULATE AS FOLLOWS:

16 1. The parties agree that Defendants may conduct a site inspection of Plaintiff's
17 property, including measuring, photographing and videotaping the property and damage, before
18 the Rule 26 conference required by Federal Rules of Civil Procedure Rule 26(f);.

19 2. The parties further agree that this site inspection shall be deemed to be Defendants
20 right to have access to and conduct a site inspection as authorized under Federal Rules of Civil
21 Procedure Rule 34;

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3. The parties further agree that this site inspection shall be conducted at a date and time to be mutually agreed to by the parties or the parties attorneys' of record.

IT IS SO STIPULATED:

DATED: December 21, 2007

RUDLOFF WOOD & BARROWS LLP

By: 

G. Edward Rudloff, Jr.
Edward P. Murphy
Anna A. Chopova

Attorneys for Defendants ALLIED PROPERTY
AND CASUALTY INSURANCE COMPANY
and AMCO INSURANCE COMPANY

DATED: December __, 2007

LOMBARDI, LOPER & CONANT, LLP

By: _____

Peter O. Glaessner

Attorneys for Plaintiff JOELLEN HRUBY

RUDLOFF WOOD & BARROWS LLP
ATTORNEYS AT LAW
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1 3. The parties further agree that this site inspection shall be conducted at a date and
2 time to be mutually agreed to by the parties or the parties attorneys' of record.

3 IT IS SO STIPULATED:

4
5 DATED: December __, 2007

RUDLOFF WOOD & BARROWS LLP

6
7 By: _____

G. Edward Rudloff, Jr.
Edward P. Murphy
Anna A. Chopova

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9 Attorneys for Defendants ALLIED PROPERTY
10 AND CASUALTY INSURANCE COMPANY
11 and AMCO INSURANCE COMPANY

12 DATED: December 20, 2007

LOMBARDI, LOPER & CONANT, LLP

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14 By: _____

Peter O. Glaessner
Peter O. Glaessner

15 Attorneys for Plaintiff JOELLEN HRUBY
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